

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

1. SUSAN MCKENZIE-NEVOLAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. CIV-12-570-D
1. DEACONESS HOLDINGS, LLC,	)	Honorable Timothy DeGiusti
d/b/a/ DEACONESS HOSPITAL	)	
	)	
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND  
RESPONSE BRIEF DEADLINE BY SEVEN DAYS**

COMES NOW, Defendant, Deaconess Holdings, L.L.C. (“Defendant” or the “Hospital”), and respectfully moves the Court to extend the deadline to file a response to Plaintiff’s Daubert Motion Challenging Defendant’s Expert Witness Testimony With Authority (*Daubert* Motion) [Dkt. # 56] by seven (7) days, or until April 23, 2013. In support of this motion, Defendant offers the following:

1. The deadline for Defendant to respond to Plaintiff’s *Daubert* Motion is April 16, 2013.
2. Defendant’s counsel does not anticipate meeting this deadline due to time spent drafting Defendant’s Response to Plaintiff’s Motion With Authority To Quash Subpoenas [Dkt. # 60]. Further, time spent working to meet discovery deadlines in other cases since the filing of Plaintiff’s *Daubert* Motion has impacted counsel’s ability to fully address the issues presented by Plaintiff’s Motion.
3. The relief requested will not affect any other deadline in this case.

4. This motion is made in good faith and not intended for delay or any improper purpose.
5. Defendant's counsel has conferred with Plaintiff's counsel and Plaintiff's counsel does not oppose this motion.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the Court enter an order extending the deadline for Defendant to file its response to Plaintiff's *Daubert* Motion by seven (7) days, or until April 23, 2013.

Respectfully submitted,

**STRECKER & ASSOCIATES, P.C.**

/s/ Sean W. Kilian

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**ATTORNEYS FOR DEFENDANT  
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 12th day of April, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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